## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

:

Plaintiff,

.

v. : Criminal Action No. 05-26-SLR

:

WYMAN GUY,

.

Defendant.

## MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

The defendant, Wyman Guy, through undersigned counsel, hereby moves this Honorable Court for more time to file pretrial motions upon receipt of discovery.

- 1. Mr. Guy was presented with an indictment on April 5, 2006, charging a violation of 18 U.S.C. § 473, selling counterfeit obligations. The defense requested, but has not yet received all of the discovery.
- 2. The government provided partial discovery to the Defense on May 16, 2006 and June 5, 2006. There are tapes that the government has indicated that it still has yet to provide.
- 3. Additional time is therefore needed to determine what if any motions should be filed. The additional time will also provide the defense adequate time to discuss the appropriate way to proceed in this case.

4. The government does not oppose this motion.

**WHEREFORE**, for the above stated reasons and any other such reasons that shall appear to the Court, it is requested that the new due date for any pretrial motions be extended until July 7, 2006.

Respectfully submitted,

/s/ Penny Marshall, Esquire Federal Public Defender First Federal Plaza 704 King Street, Suite 110 Wilmington, DE 19801

Dated: June 7, 2006

## **CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Motion for Extension of Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on June 7, 2006 to:

> Beth Moskow-Schnoll Assistant United States Attorney 1007 Orange Street, Suite 700 Wilmington, DE 19801

> > /s/Penny Marshall Federal Public Defender First Federal Plaza 704 King Street, Suite 110 Wilmington, DE 19801